

EXHIBIT A

Definitions

1. The terms “You” or “your” or “Relator” refers to Relator, Alex Doe, his agents, legal representatives, or anyone purporting to act on the named Relator’s behalf.
2. The term “Affiliate Defendants” refers to Defendants PPGC, PPGT, PPST, PP Cameron County, and PP San Antonio.
3. The term “Relator’s Complaint” refers to Relator’s Complaint filed on February 5, 2021.
4. The term “Planned Parenthood Defendants” refers to Defendants Planned Parenthood Gulf Coast, Inc. (“PPGC”), Planned Parenthood of Greater Texas, Inc. (“PPGT”), Planned Parenthood South Texas, Inc. (“PPST”), Planned Parenthood Cameron County, Inc. (“PP Cameron County”), Planned Parenthood San Antonio, Inc. (“PP San Antonio”) and Planned Parenthood Federation of America, Inc. (“PPFA”).
5. The term “Center for Medical Progress” refers to the entity headquartered in Irvine, California, including all predecessors, subsidiaries, parents and affiliates, and all past or present directors, officers, agents, representatives, employees, consultants, attorneys, and others acting on its behalf.
6. The term “Texas’s Complaint” refers to Texas’s Complaint filed on January 6, 2022.
7. The term “Center for Medical Progress videos” refers to videos related to any Planned Parenthood Defendant or other Planned Parenthood entity created by the Center for Medical Progress and/or currently or previously posted to the website of the Center for Medical Progress and/or Center for Medical Progress’s YouTube Channel from 2013 to the present.

8. The terms “Person” and “Persons” include without limitation, natural persons, corporations, associations, unincorporated associations, partnerships, and any other governmental or non-governmental entity.
9. The term “Government” refers to the government of the United States of America; any agency, office, or military branch of the U.S. Government; and any attorneys, agents, or representatives (including any auditors or investigators hired by the U.S. Government) acting or purporting to act on its behalf.
10. The term “Texas” refers to the government of the State of Texas; any agency, office, division, or department of the Texas Government, including but not limited to the Texas Health & Human Services Commission, Texas Office of the Inspector General and the Texas Department of Public Safety; and any attorneys, or agents, or representatives (including any auditors or investigators hired by the Texas Government) acting or purporting to act on its behalf.
11. The term “Louisiana” refers to the government of the State of Louisiana; any agency, office, division, or department of the Louisiana Government, including but not limited to the Louisiana Department of Health; and any attorneys, agents, representatives (including any auditors or investigators hired by the Louisiana Government) acting or purporting to act on its behalf.
12. The term “Medicaid” refers to the federal Centers for Medicare & Medicaid Services administered Medicaid program and any officers, officials, employees, agents, attorneys, or other representatives acting or purporting to act on its behalf, including any Managed Care Organization.

13. The term “Texas Medicaid” refers to the State of Texas administered Medicaid program and any officers, officials, employees, agents, attorneys, or other representatives acting or purporting to act on its behalf, , including any Managed Care Organization.
14. The term “Louisiana Medicaid” refers to the State of Louisiana administered Medicaid program and any officers, officials, employees, agents, attorneys, or other representatives acting or purporting to act on its behalf, including any Managed Care Organization.
15. The term “qualified medical expert” has the meaning used in Texas Gov’t Cod Ann. § 531.1-2(l) (“a medical director who is a licensed physician under Subtitle B, Title 3, Occupations Code, and the rules adopted by that subtitle by the Texas Medical Board, and who preferably has significant knowledge of Medicaid”).
16. The term “generally accepted medical standards” has the meaning used in the Final Notice of Termination of Enrollment dated December 20, 2016. Relator’s Compl. [Dkt. 2] Ex. C.
17. The term “fetal tissue procurement” and has the meaning used in the Final Notice of Termination of Enrollment dated December 20, 2016. Relator’s Compl. [Dkt. 2] Ex. C (referring to Planned Parenthood’s alleged “policy of agreeing to procure fetal tissue, potentially for valuable consideration, even it means altering the timing or method of abortion” and Planned Parenthood’s alleged “misrepresentation about [its] activity related to fetal tissue procurements”).
18. The term “Medicaid’s free choice of provider requirement” refers to the requirement for a state plan to allow a beneficiary to obtain Medicaid services from any institution, agency, pharmacy, person, or organization, including family planning services, that is qualified to furnish services and willing to furnish them to that particular beneficiary. *See* 42 CFR § 431.51.

19. The term “including” shall mean “including, but not limited to.”
20. The term “overpayment” has the meaning as used in Paragraphs 17 and 40 of the Texas Complaint.
21. The term “the Media” refers to any news organization or mass media organization including print, internet, television, radio, or other media.
22. The term “Grace Period” refers to the thirty-day period granted by the Texas Health and Human Services Commission to Planned Parenthood through February 3, 2021, referenced in Texas’s Complaint. Tex. Compl. ¶ 6.
23. “Documents” as used herein shall be construed to the full extent of Fed. R. Civ. P. 34, and shall include every original and every non-identical copy of any original of all mechanically written, handwritten, typed or printed material, electronically stored data, microfilm, microfiche, sound recordings, films, photographs, videotapes, slides, and other physical objects or tangible things of every kind and description containing stored information, including but not limited to, transcripts, letters, correspondence, notes, memoranda, tapes, records, telegrams, electronic mail, facsimiles, periodicals, pamphlets, brochures, circulars, advertisements, leaflets, reports, research studies, test data, working papers, drawings, maps, sketches, diagrams, blueprints, graphs, charts, diaries, logs, manuals, agreements, contracts, rough drafts, analyses, ledgers, inventories, financial information, bank records, receipts, books of account, understandings, minutes of meetings, minute books, resolutions, assignments, computer printouts, purchase orders, invoices, bills of lading, written memoranda or notes of oral communications, and any other tangible thing of whatever nature.

24. The terms “relate to,” “related to,” “relating to,” and “concerning” shall mean mentioning, comprising, consisting, indicating, describing, reflecting, referring, evidencing, regarding, pertaining to, showing, discussing, connected with, memorializing, or involving in any way whatsoever the subject matter of the request, including having a legal, factual or logical connection, relationship, correlation, or association with the subject matter of the request. A document may “relate to” or an individual or entity without specifically mentioning or discussing that individual or entity by name.
25. The terms “communication” and “communications” shall mean all meetings, interviews, conversations, conferences, discussions, correspondence, messages, telegrams, telefax, electronic mail, mailgrams, telephone conversations, and all oral, written and electronic expressions, or other occurrences whereby thoughts, opinions, information, or data are transmitted between two or more persons.
26. The terms “rely,” “relied,” and “relied upon” shall refer to all information that in any way served as the basis for Relators’ allegations, including any information that, in whole or in part, confirmed, supported, influenced, shaped, or contributed to Relators’ knowledge of the allegations made in the Complaint, or otherwise was considered by Relators in asserting the allegations made in the Complaint.
27. The terms “communication” and “communications” shall mean all meetings, interviews, conversations, conferences, discussions, correspondence, messages, telegrams, telefax, electronic mail, mailgrams, telephone conversations, and all oral, written, and electronic expressions, or other occurrences whereby thoughts, opinions, information, or data are transmitted between two or more persons.

28. “Identify” or “state the identity of” shall mean to state all dates, names of all persons with knowledge, descriptions of the knowledge of each person, and descriptions of all documents relating to your response. In addition:
- In the case of meetings or communications, to state the date of the communication or meeting, and all persons present.
 - In the case of invoices or payments, to state the invoice amounts, invoice dates, payment amounts, payment dates, descriptions of services performed, credits relating to the invoice or payment, and any amendments, modifications, revisions, or recalculations of any invoices or payments.
 - In the case of a person, to state the full name; home and business address and telephone numbers; employer or business affiliation; and occupation and business position held.
 - In the case of a company, to state the name; if incorporated, the place of incorporation; the principal place of business; and the identity of the person(s) having knowledge of the matter with respect to which the company is named.
 - In the case of a partnership, to state its principal address and the name and resident address of each general partner.
 - In the case of a document, to state the identity of the person(s) who prepared it; the sender and all recipients; the title or a description of the general nature of the subject matter; the date of preparation; the date and manner of distribution and publication; the location of each copy; the bates-number(s), if applicable; the identity of the present custodian; and the identity of the person(s) who can identify it.
 - In the case of an act or event, to state a complete description of the act or event; when it occurred; where it occurred; the identity of the person(s) performing said act (or omission); the identity of all persons who have knowledge, information or belief about the act; when the act, event, or omission first became known; the circumstances; the manner in which such knowledge was first obtained; and the documents or other writings which memorialize the instance.
29. “Describe in detail” shall mean to identify any document or communication concerning the item in question and to provide a complete, factual summary chronologically setting forth the substance of, and identifying any person participating in, witnessing, or having

knowledge of, whether firsthand or otherwise, any fact, action, occurrence, conduct, event, condition, or circumstance concerning the item in question.

Instructions

1. These Interrogatories are continuing in character, so as to require you to file supplemental responses if you obtain further or different information after the date upon which you provided your Response(s).
2. Please note that all answers are to be made separately and fully, and that an incomplete or evasive answer is a failure to answer. When an Interrogatory calls for an answer in more than one part, please separate the parts in your answer accordingly so that each part is clearly set out and understandable.
3. If you have only incomplete knowledge of the answer to an Interrogatory, please answer to the extent of your knowledge and state specifically the portion or area of the Interrogatory of which you have only incomplete knowledge, and identify the person who does or persons who do have, or might have, additional knowledge or information to complete the answer.
4. For each Interrogatory, please identify the persons from whom the information contained in the answer is obtained, the persons who swear to the truth of that information, and any documents you relied on in formulating your answer.
5. If you object to any Interrogatory or Interrogatory subpart, or otherwise withhold responsive information because of a claim of privilege, work product or other grounds:
 - identify the Interrogatory question and subpart to which objection or claim of privilege is made;
 - state whether the information is found in a document, oral communication, or in some other form;

- identify all grounds for objection or assertion of privilege, and set forth the factual basis for assertion of the objection or claim of privilege; and
 - identify the information withheld by description of the topic or subject matter, the date of the communication, and the participants.
- 6. If, in the course of answering any of the Interrogatories, you encounter any ambiguity in construing either the inquiry or a definition relevant to the inquiry, explain what you find to be ambiguous and what construction you used in providing your answer.
- 7. All uses of the conjunctive in these Interrogatories should be interpreted as including the disjunctive and vice versa. Words in the singular should be read to include words in the plural and vice versa.
- 8. When an Interrogatory asks about “each of the Planned Parenthood Affiliates” you must provide a response for each of PPGC, PPST, PP Cameron County, and PP San Antonio.
- 9. Unless otherwise specific, the relevant time period for these Document Request is 2010 to the present.
- 10. You are under an affirmative duty to supplement your responses to these Document Requests with documents you may acquire or discover after completing your production, if you learn your response is in some material respect incomplete or incorrect and the additional or corrective information has not been made known to Planned Parenthood.

Interrogatories

1. Identify each and every claim for payment submitted by each of the Affiliate Defendants that you contend was submitted in violation of the False Claims Act, the Texas Medicaid Fraud Prevention Act, or Louisiana Medical Assistance Programs Integrity Law. For each claim, state the date of submission; the name of the Affiliate Defendant that submitted the claim; the amount of the claim submitted; the person(s) who submitted or signed the claim;

identify the recipient of the claim; state the amount paid to Affiliate Defendants on the claim; describe in detail what is allegedly fraudulent about the claim; identify all evidence you have to support your assertion that the claim was fraudulent; and identify all persons with knowledge concerning the allegedly fraudulent claim. This request does not seek patient names, patient dates of birth, patient marital status, insured names, insured dates of birth, insured marital status, or other patient information associated with the claims.

2. Identify each overpayment received by each of the Affiliate Defendants that you contend Affiliate Defendants were obligated to report and return, but did not. For each overpayment, identify any associated claim by stating the date of submission of the claim; the name of the Affiliate Defendant that submitted the claim, the amount of the claim; the person(s) who submitted or signed the claim; identify the recipient of the claim; state the amount paid to Affiliate Defendants on the claim; describe in detail what is allegedly fraudulent about the claim; identify the principal and material facts supporting your assertion that the claim was fraudulent; and identify all persons with knowledge concerning the allegedly fraudulent claim. For each violation of the False Claims Act, the Texas Medicaid Fraud Prevention Act, and the Louisiana Medical Assistance Programs Integrity Law Act that you allege in this case, state the damages that you believe the Government, Texas, or Louisiana incurred as a result of the conduct you have alleged. Your answer should include a detailed description of how the damages are calculated, the facts supporting your contention that each Planned Parenthood Defendant is liable for those damages, and all persons with knowledge of the foregoing. This request does not seek patient names, patient dates of birth, patient marital status, insured names, insured dates of birth, insured marital status, or other patient information associated with the claims.

3. To the extent that information underlying your allegations in this case came from sources other than your own investigation as described in the Relator's Complaint, identify the sources from which your information is derived, describe what you learned from that source, and state when you consulted the source.
4. Identify and describe in detail the specific parts of the Texas Medicaid Provider Procedures Manual and the Louisiana Medicaid Services Manual that you contend each of the Planned Parenthood Affiliates violated, and describe in detail how you believe that each of the Planned Parent Affiliates violated the Texas Medicaid Provider Procedures Manual and/or the Louisiana Medicaid Services Manual.
5. Identify and describe in detail the principal and material facts and documents known to you relating to any actions taken by each of the Planned Parenthood Affiliates to engage in or facilitate fetal tissue procurement or donation, or agree to engage in or facilitate such procurement or donation, including any and all facts relating to the Center for Medical Progress videos, that in your view renders each of the Planned Parenthood Affiliates unqualified to provide medical services under Medicaid, Texas Medicaid, or Louisiana Medicaid or violates generally accepted medical standards. As required by Instruction No. 8, you must provide a response for each of PPGC, PPST, PP Cameron County, and PP San Antonio.
6. Describe in detail all investigations, reviews, or other inquiries conducted by you related to your allegations that each Affiliate Defendant engaged in improper conduct relating to fetal tissue procurement or donation, or agreed to engage in such conduct, or otherwise violated laws or regulations relating to medical research or fetal tissue procurement or donation or agreed to do so. Your response should identify the persons involved in such

investigations, reviews, or other inquiries, and describe each person's role in the investigation, reviews, or other inquiries.

7. Describe in detail the information you claim that you "voluntarily disclosed to the government prior to any public disclosure." Rel.'s Opp'n to Defs.' Mot. To Dismiss [Dkt. 61] at 26-27. Your response should identify the specific facts, allegations, and transactions that you claim you disclosed, to whom you disclosed them, through what means you disclosed them, any documents (including videos) through which you disclosed them, and when you disclosed them.
8. Describe in detail the principal and material facts relevant to your contention that each of the Planned Parenthood Affiliates were "aware of or should have been aware of their obligation to repay the government." Rel.'s Opp'n to Defs.' Mot. To Dismiss [Dkt. 61] at 12-16.
9. Identify by dates, locations, and names of institution or employer each and every place you have ever lived, studied, or worked, beginning with high school. Include in your response your reason for leaving each institution or employer, including whether you were terminated or asked to resign, and if so why.
10. Identify each and every civil, criminal, or administrative proceeding in which you have been accused of fraud, misrepresentation, false statement, perjury, theft, any other act of dishonesty, or recording a person without permission. For each proceeding, identify the nature of the proceeding, the court or administrative tribunal, any case number assigned to the proceeding, and any judgment, decision, opinion, or outcome associated.

11. If you deny any of the Requests for Admission issued by any of the Defendants in this case, in full or in part, describe in detail the basis for your denial.

/s/ Tirzah S. Lollar

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*Attorneys for Defendant Planned
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June 13, 2022

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing First Set of Interrogatories to Relator Alex Doe by Defendant Planned Parenthood Gulf Coast, Inc. has been served upon all attorneys of record in this case on this, the 13th day of June, 2022, by electronic email.

/s Tirzah S. Lollar